

Lincoln D. Bandlow, Esq. (CA #170449)
lincoln@bandlowlaw.com

Law Offices of Lincoln Bandlow, P.C.
1801 Century Park East, Suite 2400
Los Angeles, CA 90067
Phone: (310) 556-9680
Fax: (310) 861-5550

Attorney for Plaintiff
Strike 3 Holdings, LLC

Steven C. Vondran, [SBN 232337]
steve@vondranlegal.com
The Law Offices of Steven C. Vondran, PC
One Sansome Street, Suite 3500
San Francisco, California 94104
Phone: (877) 276-5084
Fax: (888) 551-2252

Attorneys for Defendant
John Doe subscriber assigned
IP address 24.5.9.34

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

STRIKE 3 HOLDINGS, LLC,

Plaintiff,

vs.

JOHN DOE subscriber assigned IP address
24.5.9.34,

Defendant.

Case No.: 20-cv-03475-JCS

**JOINT STATEMENT IN RESPONSE TO
COURT'S JULY 15, 2020 OSC**

Lincoln D. Bandlow, Esq., counsel for Plaintiff Strike 3 Holdings, LLC ("Plaintiff"), and
Steven Vondran, Esq., counsel for Defendant John Doe subscriber assigned IP address 24.5.9.34
("Doe"), hereby respectfully submit this Joint Statement in Response to this Court's OSC dated
July 15, 2020 (Dkt. 11).

As the Court is aware, Plaintiff applied ex parte for an order allowing Plaintiff to serve an early subpoena on Comcast Cable, which Plaintiff believes is the internet service provider (“ISP”) for Defendant. In its OSC, the Court ordered the parties to meet and confer to determine whether the parties could obviate the need for the third-party discovery that Plaintiff seeks. The parties have met and conferred and, in fact, have reached an agreement that will obviate the need for the discovery sought. Under the terms of that agreement, the parties have stipulated to a [Proposed] Protective Order that has been filed concurrently with this Joint Statement. Within ten (10) days of the entry of that Protective Order by this Court, Defendant’s counsel will provide Plaintiff with Defendant’s counsel’s signed written consent, and Plaintiff shall serve such written consent, on the ISP (sent via U.S. Mail and email with a copy sent to Defendant’s counsel) to release only Defendant’s name and address to Plaintiff’s counsel, pursuant to 47 U.S.C. 551(c)(1), and this information will then be subject to the Protective Order.

Accordingly, if this Court enters the concurrently filed [Proposed] Protective Order, this would render Plaintiff’s request for a subpoena to the ISP moot and the Court would not have to address the pending ex parte application seeking that relief. The parties thank the Court for its assistance in this matter.

EXECUTED: July 28, 2020

EXECUTED: July 28, 2020

/s/ Lincoln Bandlow
Lincoln D. Bandlow
LAW OFFICES OF
LINCOLN BANDLOW, PC

/s/ Steven Vondran
Steven C. Vondran
LAW OFFICES OF STEVEN C.
VONDRAN PC

Attorney for Plaintiff
Strike 3 Holdings, LLC

Attorney for Defendant
John Doe